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**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 23-30246-MVL-7</b>
<b>WITH PURPOSE, INC.,</b>	§	
	§	<b>Chapter 7</b>
<b>Debtor.</b>	§	

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**CERTIFICATION TO COURT OF APPEALS BY ALL PARTIES**

An Amended Notice of Appeal having been filed in the above-referenced matter on January 31, 2025 (Doc. 420), Appellants With Purpose, Inc. and WPI Collateral Management, LLC (collectively “**Appellants**”) and Appellees Scott M. Seidel, Trustee, Jackson Investment Group, LLC, and GloriFi Acquisitions, LLC (collectively

**“Appellees”**) hereby certify to the Court under 28 U.S.C. §158(d)(2)(A) that a circumstance specified in 28 U.S.C. § 158(d)(2)(A)(iii) exists, warranting a direct appeal to the United States Court of Appeals for the Fifth Circuit.

1. This certification arises in an appeal from the following orders entered by the United States Bankruptcy Court for the Northern District of Texas: (a) the oral bench ruling entered on December 6, 2025; (b) the Memorandum Opinion Denying Conversion to Chapter 11 and Granting the Trustee’s Compromise with Jackson Investment Group Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure entered on January 22, 2025; (c) the Order Denying Motion to Convert Case to Chapter 11 entered on January 24, 2025; and (d) the Order Granting Trustee’s Motion for Approval of Compromise and Settlement With, and Sale to, Jackson Investment Group, LLC, entered on January 24, 2025 (collectively, the “Orders on Appeal”).

2. All of the Appellants and all of the Appellees jointly certify that an immediate appeal of the Orders on Appeal to the U.S. Court of Appeals to the Fifth Circuit may materially advance the progress of the case or proceeding in which the appeal is taken. *See* 28 U.S.C. § 158(d)(2)(A)(iii).

Dated: February 19, 2025

Respectfully submitted,

/s/ Ryan Downton

/s/ Frank J. Wright

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### **CERTIFICATE OF SERVICE**

I hereby certify that on February 19, 2025, a true and correct copy of the foregoing document was served on all Notice Parties and all parties consenting to electronic service of this case *via* the Court's *ECF system* for the Northern District of Texas.

/s/ Frank J. Wright  
Frank J. Wright